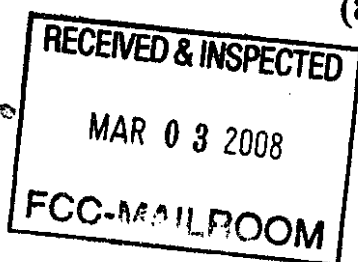


Communication Service Center Inc.
PO Box 4118, Greenville, SC 29608
(864) 246-0914 fax (864) 246-2303



~~LATENT~~ FILE COPY ORIGINAL

CERTIFICATION

I, Robert A. Winchester, hereby certify as a company officer that I have personal knowledge that this company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. 64.2001-2011.

A handwritten signature in black ink, appearing to read "Robert A. Winchester".

Robert A. Winchester
President
February 20, 2008

Communication Service Center Inc.
FCC Registration Number: 0001884014
Form 499 Filer ID: 817456
PO Box 4118, Greenville, SC 29608

Statement

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: None.
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps carriers are taking to protect CPNI: No attempted access CPNI on System.
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None.
 - Category of complaint:
 - 0 number of instances of improper access by employees
 - 0 number of instances of improper disclosure to individuals not authorized to receive the information
 - 0 number of instances of improper access to online information by individuals not authorized to view the information
 - 0 number of other instances of improper access or disclosure
 - Description of instances of improper access or disclosure: None

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CLIENT MEMORANDUM

FROM: Elizabeth R. Sachs, Tamara Davis-Brown and Katherine Patsas
RE: Customer Proprietary Network Information Annual Certification
DATE: February 12, 2008

You may recall in April of last year that we alerted you to the Federal Communications Commission's ("FCC" or "Commission") Order in CC Docket No. 96-115 and WC Docket No. 04-36 that strengthened the privacy rules regarding disclosure and unauthorized access to Customer Proprietary Network Information ("CPNI") as required by Section 222 of the Communications Act. This memorandum is to remind you that all telecommunications carriers, whether interconnected or not, must annually file, on or before March 1st, a certification showing compliance with the new CPNI rules.

We understand that many of the original and modified rules will seem confusing and foreign to the way your company does business. Most EWA carrier members do not have call centers, web-based access to customer information or the types of marketing arrangements with related or unrelated joint venturers that give rise to the types of CPNI violations the FCC is addressing in these rules. In fact, most do not have or maintain the type of proprietary customer information that gives rise to the CPNI concerns, particularly if the system is not even interconnected with the telephone network. CPNI violations and the rules intended to prevent them are more logically applicable to cellular systems with large numbers of customers and networks that track calling information that might attract misuse by data brokers or others. Nonetheless, the FCC has made it clear that the rules apply to all carriers, no matter how small and irrespective of whether they are interconnected, so it is essential that you submit your certification on a timely basis AND that you have written and implemented a CPNI program within your organization that meets the FCC requirements.

By way of review, the revisions to the CPNI rules:

- prohibit carriers from releasing call detail information to customers during customer-initiated telephone contact except when the customer provides a password;

- require carriers to notify customers immediately when a password is lost or forgotten and an on-line account or an address of record is created or changed;
- establish a notification process for both law enforcement and customers in the event of a CPNI breach;
- modify the existing CPNI rules to require carriers to obtain opt-in consent from a customer before disclosing a customer's CPNI to a carrier's joint venture partner or independent contractor for purposes of marketing communications-related services to the customer;
- extend the application of CPNI rules to interconnected voice over Internet protocol ("VoIP") service; and
- require carriers to take reasonable measures to discover and protect against pretexting.¹

Again, it is important to understand that all telecommunications carriers must have procedures in place to comply with the FCC's CPNI rules, including the recent revisions, and that these procedures must be maintained in a prepared document (i.e., CPNI Procedures Manual) and kept in your company's files.

With respect to filing the upcoming annual certification with the Commission, the FCC recently released specific filing guidelines to which it expects telecommunications carriers to adhere.

The certificate must:

- provide a statement explaining how the procedures ensure that the carrier is or is not in compliance with the requirements of the CPNI rules;
- provide a summary of CPNI customer complaints and any enforcement actions from the past year, including (1) number of complaints; (2) type of breach (unauthorized disclosure of CPNI vs. unauthorized access to CPNI); (3) manner in which the CPNI was obtained (on-line vs. company records); and (4) individual who unlawfully obtained the CPNI (unauthorized employee vs. outsider to the company);
- provide an explanation of any action taken against data brokers. If none, the certificate should so indicate;

¹ Pretexting is the practice of pretending to be a particular customer or other unauthorized person in order to obtain access to that customer's calling details or other private communications records.

- provide any information your company has on pretexters who have attempted to access the CPNI over the past year and what steps, if any, have been taken to protect the CPNI from pretexters;
- be signed by an officer, stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules; and
- be filed either manually (paper) or electronically referencing EB Docket No. 06-36. Manual filings should be addressed to the Commission's Secretary, Marlene H. Dortch, Office of the Secretary, FCC, 445 12th Street, Suite TW-A325, Washington, D.C. 20554. Two courtesy copies must be delivered to the FCC, Enforcement Bureau, Telecommunications Consumers Division, 445 12th Street, Washington, D.C. 20554. One copy also must be sent to Best Copy and Printing, Inc. 445 12th Street, Suite CY-B402, Washington, D.C. 20554.
Electronic filings can be made using the FCC's Electronic Comment Filing System, <http://www.fcc.gov/cgb/ecfs/>. Simply follow the instructions for electronic filing and file under EB Docket No. 06-36. Electronic filers should also e-mail their certification to Best Copy and Printing, Inc. at FCC@BCPIWEB.COM. Our office can provide assistance with electronic filings.

EWA has included a sample certification for your reference and guidance, although you may expand on the description of practices used in your company. This document is being provided as a courtesy to EWA members and is for illustrative purposes only. Member carriers should consult with FCC regulatory counsel regarding their specific certification and in-house CPNI procedures and policies.

Remember, however, that the annual certification due on or before March 1st is confirmation that the company has a written CPNI policy that meets FCC requirements, not a substitute for that policy document.